

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

RowVaughn Wells,

Plaintiff,

v.

The City of Memphis *et al.*,

Defendants.

Case No. 2:23-CV-02224

**PLAINTIFF’S MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO THE
CITY OF MEMPHIS’S MOTION TO COMPEL (ECF 383)**

Plaintiff, through her undersigned counsel, pursuant to Fed. R. Civ. P. 6(b)(1)(A), submits this motion for extension of time to file her response in opposition to Defendant City of Memphis’s Motion to Compel (ECF 383). No Defendant has voiced any objection to the extension requested herein. In support of her motion, Plaintiff states as follows:

1. On April 10, 2025, the City filed a Motion to Compel Production of Documents Pursuant to City’s Subpoena *Duces Tecum* Propounded to Rodeny Wells, Keyana Dixon, and Lenge Dupree. (ECF 383). Plaintiff’s response brief is currently due April 24.

2. Plaintiff’s counsel has been working diligently to prepare Plaintiff’s response brief. However, due to multiple obligations in this litigation and in counsel’s other matters, including an out-of-state deposition in this case on April 14 and an all-day sentencing hearing in another matter on April 23, counsel requires additional time to complete Plaintiff’s response to the City’s motion.

3. Plaintiff respectfully requests an additional 7 days, to and including May 1, 2025, to file her response.

4. This request is made in good faith and not for purposes of delay. The requested extension will not cause prejudice to any party.

5. Plaintiff respectfully submits that, for the foregoing reasons, good cause supports her request for a seven-day extension of time to file her response.

6. Plaintiff conferred via e-mail with all Defendants regarding the relief requested in this motion. Defendants Michelle Whitaker and Robert Long responded that they have no objection. The remaining defendants have not responded as of this filing. No Defendant has voiced any objection.

WHEREFORE, for the foregoing reasons, Plaintiff respectfully requests that this Court enter an order extending the time for Plaintiff to file her response in opposition to the Defendant City of Memphis's Motion to Compel (ECF 383) by seven days, to and including May 1, 2025.

Dated: April 21, 2025

Respectfully submitted,

/s/ Joshua M. Levin

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CERTIFICATE OF CONSULTATION

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/s/ Joshua M. Levin